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March 4, 2020

VIA ECF

The Honorable Joseph A. Dickson
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Valley Chabad Inc. v. Borough of Woodcliff Lake et al.*,
Civil Action No. 2:16-cv-8087 (JLL) (JAD)

United States v. Borough of Woodcliff Lake et al.,
Civil Action No. 2:18-cv-10511 (JLL) (JAD)

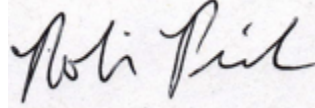
Dear Judge Dickson,

I am writing to you on behalf of all the parties in the above-referenced consolidated matters.

The parties in the private action have reached an impasse with respect to one of the terms in the Settlement Agreement and Consent Order in the private action. The parties to the United States' action are close to finalizing a proposed consent order, but the United States would not agree to a global settlement of this matter with the proposed term in the private settlement documents. In both actions, the parties have continued to work together in good faith since the last settlement conference and have otherwise largely reached agreement when reducing the material terms to writing.

On behalf of all parties, we therefore respectfully seek the Court's assistance with this matter and request that your Honor schedule a settlement conference, with counsel and their clients, before the Court.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robin Pick", is written over a light gray rectangular background.

Robin Pick, Esq.

cc: All counsel of record (via ECF)